

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

XU LUN, a pseudonym,

Plaintiff,

v.

MILWAUKEE ELECTRIC TOOL
CORPORATION, and
TECHTRONIC INDUSTRIES
COMPANY LIMITED,

Defendants.

Case No. 2:24-cv-00803-BHL

STIPULATED MOTION FOR LEAVE TO CONSOLIDATE BRIEFING

Plaintiff Xu Lun and Defendant Techtronic Industries Company Ltd. (“TTI”) (collectively, the “Parties”) stipulate and hereby move for leave for TTI to file one consolidated brief in Reply in Support of TTI’s Motion to Dismiss (Dkt. # 31) and in Response to Plaintiff’s Conditional Motion for Jurisdictional Discovery (Dkt. # 42).

On December 16, 2024, Mr. Xu filed his consolidated opposition to TTI’s and Milwaukee Tool’s individual motions to dismiss Plaintiff’s First Amended Complaint. Dkt # 41. TTI’s reply in support of its motion is due on January 13, 2025. On December 23, 2024, Mr. Xu filed a separate motion conditionally seeking jurisdictional discovery from TTI specifically. TTI’s opposition to the conditional motion for jurisdictional discovery is also due January 13, 2025. Dkt. # 37. The Parties agree that the jurisdiction issues raised in both motions are substantially related, and the Parties therefore agree that it would be most efficient, and would save the Court time and resources, for TTI to combine its substantive opposition to Mr. Xu’s conditional request for jurisdictional discovery and its reply in support of its motion to dismiss, in so far as that motion requests dismissal of TTI pursuant to Rule 12(b)(2).

The parties further stipulate and agree that TTI's consolidated brief shall be no more 45-pages, the combined page limit for both briefs under this District's local rules, except that no more than 15-pages of TTI's combined brief shall relate to matters in strict reply regarding the Motion to Dismiss and the grounds for relief TTI requests therein under Rule 12(b)(6). *See* Civil L. R. 7(f). The timing and length restrictions for Mr. Xu's reply in support of his conditional motion for jurisdictional discovery will remain unchanged, and that reply shall not address matter strictly raised in TTI's Motion to Dismiss under 12(b)(6).

IT IS SO STIPULATED.

Dated this 8th day of January, 2025.

By: /s/ Zane David Memeger

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